

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN THE MATTER OF:

TAMMY LYNNE PEARCE,

Debtor.

Chapter 7
Case No. 19-42559-PJS
Hon. Phillip J. Shefferly

**TRUSTEE'S APPLICATION TO EMPLOY
SANDRA O'CONNOR LAW, PLLC AS COUNSEL FOR TRUSTEE**

K. Jin Lim, the Chapter 7 Trustee of the bankruptcy estate of Tammy Lynne Pearce, submits this Application to Employ Sandra O'Connor Law, PLLC as Counsel for Trustee, pursuant to E.D. Mich. LBR 2014-1(a), Fed. R. Bankr. P. 2014 and 11 U.S.C. § 327. (See Exhibit A)

IN SUPPORT of the application, the Trustee states:

1. On February 25, 2019, Tammy Lynne Pearce ("the Debtor") filed a voluntary petition under Chapter 7 of the Bankruptcy Code.
2. K. Jin Lim is the duly appointed Chapter 7 Trustee in this case.
3. The Trustee wishes to employ the law firm of Sandra O'Connor Law, PLLC whose member is duly admitted to practice in this Court.
4. The Trustee requires the advice and assistance of counsel for the following purposes:

- (a) To give the Trustee legal advice with respect to her powers and duties;
- (b) To prepare reports and other legal papers on behalf of the Trustee;
- (c) To investigate the Debtor's financial affairs;
- (d) To pursue Chapter 5 causes of action;
- (e) To prepare all legal pleadings necessary to liquidate the Debtor's non-exempt equity in property; and
- (f) To perform all other legal services for the Trustee as may be necessary.

5. Sandra O'Connor Law, PLLC's Verified Statement of Disinterestedness is attached hereto as Exhibit B.

6. The hourly fee for legal services provided by Sandra L. O'Connor is currently \$275.00. All fees for legal services are subject to Court approval.

WHEREFORE, the Trustee requests that an Order be entered authorizing her to employ Sandra O'Connor Law, PLLC as her attorney in this case.

Dated: April 17, 2019

/s/ K. Jin Lim
K. JIN LIM (P43151)
Chapter 7 Trustee
176 S. Harvey
Plymouth, MI 48170
(734) 416-9420
kjinlim7@gmail.com

SANDRA O'CONNOR LAW, PLLC

Dated: April 17, 2019

/s/ Sandra L. O'Connor

SANDRA L. O'CONNOR (P70984)

Attorney for Trustee

101 West Big Beaver Road, Suite 225

Troy, MI 48084

(248) 817-6669

sandra@sandraoconnorlaw.com

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**ORDER AUTHORIZING EMPLOYMENT OF SANDRA O'CONNOR
LAW, PLLC AS COUNSEL FOR CHAPTER 7 TRUSTEE**

The Trustee having filed her Application to Employ Sandra O'Connor Law, PLLC as Counsel for Trustee with attached Statement of Disinterestedness; the Office of the United States Trustee having concurred in the Application; and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that:

(A) Sandra O'Connor Law, PLLC and its attorney Sandra L. O'Connor are authorized to act as counsel for the Chapter 7 Trustee in this case pursuant to the terms and conditions set forth in the Application and its supporting Statement of Disinterestedness;

(B) Compensation may be paid after application and after Court order authorizing payment.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
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VERIFIED STATEMENT OF DISINTERESTEDNESS

Sandra L. O'Connor states as follows:

1. I am the sole owner, managing member, and attorney of Sandra O'Connor Law, PLLC whose offices are located at 101 West Big Beaver Road, Suite 225, Troy, Michigan 48084 ("the Firm")
2. I am authorized to make this Statement on behalf of the Firm.
3. To the best of my information, knowledge and belief, neither I nor the Firm represents or holds any interest adverse to the estate.
4. To the best of my information, knowledge and belief, neither I nor the Firm has any connections with the Debtor, creditors, the Trustee, or any other party in interest, their respective known attorneys or accountants, the United States Trustee or any other person employed by the United States Trustee.
5. I have been advised that the Debtor has numerous creditors and, accordingly, the Firm may have rendered services or had business associations with

EXHIBIT B

such creditors or their counsel in the ordinary course of the Firm's business, but none of these services have been in connection with, nor impact this proceeding.

6. The Firm and I are "disinterested persons" as such term is defined in 11 U.S.C. § 101(14) of the Bankruptcy Code.

7. The Firm has not made any agreement to share compensation in this case and I know of no reason why the Firm should not act as attorney for the Trustee.

Dated: April 17, 2019

/s/ Sandra L. O'Connor
SANDRA L. O'CONNOR
Sandra O'Connor Law, PLLC
101 West Big Beaver Road, Suite 225
Troy, MI 48084
(248) 817-6669
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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2019, I electronically filed the 1) Trustee's Application to Employ Sandra O'Connor Law, PLLC as Counsel for Trustee; and 2) Certificate of Service with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Office of the U.S. Trustee
211 W. Fort Street, Suite 700
Detroit, MI 48226

K. Jin Lim, Esq.
176 S. Harvey
Plymouth, MI 48170

Katherine R. Sikorski, Esq.
29211 Ford Rd.
Garden City, MI 48135

Dated: April 17, 2019

By: /s/ Sandra L. O'Connor
SANDRA L. O'CONNOR (P70984)
Attorney for Trustee
101 West Big Beaver Road, Suite 225
Troy, MI 48084
(248) 817-6669
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